

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANDERSON NEWS, L.L.C. and LLOYD WHITAKER,
as the Assignee under an Assignment for the Benefit of
Creditors for Anderson Services, L.L.C.,

Plaintiffs,

- against -

AMERICAN MEDIA, INC., BAUER PUBLISHING
CO., L.P., CURTIS CIRCULATION COMPANY,
DISTRIBUTION SERVICES, INC., HACHETTE
FILIPACCHI MEDIA U.S., INC., HEARST
COMMUNICATIONS, INC., HUDSON NEWS
DISTRIBUTORS LLC, KABLE DISTRIBUTION
SERVICES, INC., RODALE, INC., TIME INC., and
TIME/WARNER RETAIL SALES & MARKETING,
INC.,

Defendants.

AMERICAN MEDIA, INC., HEARST
COMMUNICATIONS, INC., and TIME INC.,

Counterclaim-Plaintiffs,

- against -

ANDERSON NEWS, L.L.C. and CHARLES
ANDERSON, JR.,

Counterclaim-Defendants.

09 CIV. 2227 (PAC)
ECF CASE

NOTICE OF MOTION

ORAL ARGUMENT
REQUESTED

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Rachel M. Fritzler, executed December 19, 2014, with exhibits thereto; the December 19, 2014 Memorandum of Law in Support of Defendants Time Inc., Time/Warner Retail Sales & Marketing, Inc. and Hearst Communications Inc.'s Motion for Summary Judgment Against Anderson News, L.L.C.; the Statement of Undisputed Material Facts submitted herewith; and

upon all prior pleadings and proceedings herein, defendants Time Inc., Time/Warner Retail Sales & Marketing, Inc. and Hearst Communications, Inc. (as successor-in-interest to defendant Hachette Filipacchi Media U.S., Inc.) hereby move this Court, Hon. Paul A. Crotty, District Judge at the United States Courthouse, 500 Pearl Street, Courtroom 14C, New York, New York, for an order pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, granting summary judgment against Anderson News, L.L.C., as set forth more fully in the accompanying Memorandum of Law, and granting such other and further relief as the Court deems just and proper.

December 19, 2014

CRAVATH, SWAINE & MOORE LLP,

By

/s/ Rowan D. Wilson

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By Jonathan R. Donnellan / by consent
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